

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff

Vs

JUAN RAMOS-RIOS

Defendant

CRIMINAL NUMBER 98-013 (HL)

* * * * *

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

TO THE HONORABLE COURT:

COMES NOW, JUAN RAMOS-RIOS, the defendant, by and through the undersigned attorney, and very respectfully **ALLEGES** and **PRAYS** as follows:

1. On May 24, 2000 defendant Juan Ramos-Ríos was sentenced by the Honorable Judge Héctor Laffite to serve a term of imprisonment of 46 months and a term of five (5) years of supervised release.
2. Defendant Ramos-Ríos was released on November 2003 from prison and commenced to serve his five (5) years term of supervised release.
3. As up this moment the defendant has served almost 33 months with an impeccable behavior.

4. The defendant is gainful employed as a partner in a construction company and is in need to travel at least twice a month to Saint Thomas to conduct construction business.

5. Further, the defendant is presently sustaining a consensual relationship and has stable relationship with his partner for the last year.

6. Defendant has not provided any positive urinalysis test and has an excellent working record.

7. It is the defendant's believe that if this Court consults the Probation Office, the defendant excellent record could be easily corroborated.

8. It is defendant's request to this Honorable Court that the term of Supervised Release be reduced and be adjudge for an early termination.

WHEREFORE, it is respectfully requested that the defendant's supervised release **BE TERMINATED** by this Honorable Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this December 19, 2006.

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I HEREBY CERTIFY: That I on this same date electronically filed the foregoing document with the Clerk of Court for the District of Puerto Rico, through the CM/ECF electronic filing system, which will provide notification of this filing to the United States Attorneys Office for the District of Puerto Rico.

***S/LUIS RAFAEL RIVERA
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